



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 4, 2019

BY ECF

The Honorable Richard J. Sullivan
United States Circuit Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Raheem J. Brennerman, 17 Cr. 337 (RJS)*

Dear Judge Sullivan:

Pursuant to the Court's January 28, 2019 order directing ICBC (London) plc to file a supplemental affidavit in support of its request for attorneys' fees, enclosed is an affidavit by Paul Hessler, Esq., counsel for ICBC, which set forth the bases for ICBC's request for a restitution award including attorneys' fees in the amount of \$771,378.38.

The Government respectfully requests that it be permitted to file a response, by February 8, 2019, setting forth its view as to whether the attorneys' fees sought by ICBC, or a portion of those fees, may be awarded under the Mandatory Victim Restitution Act, 18 U.S.C. § 3663A.

Respectfully submitted,

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